

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

Solas OLED Ltd., an Irish corporation,

Plaintiff,

vs.

Samsung Display Co., Ltd., a Korean corporation,
Samsung Electronics Co., Ltd., a Korean
corporation, and Samsung Electronics America, Inc.,
a New York corporation,

Defendants.

CASE NO. 2:19-cv-152-JRG

JURY DEMANDED

DECLARATION OF NEIL A. RUBIN IN SUPPORT OF SOLAS' OPENING CLAIM
CONSTRUCTION BRIEF

I, Neil A. Rubin, state as follows:

I am a member of the State Bar of California and an attorney at the law firm of Russ August & Kabat, counsel for Plaintiff Solas OLED LTD. (“Solas OLED”) in the above-captioned actions. I have personal knowledge of the facts set forth in this declaration, and, if called upon to testify, could and would testify competently thereto.

1. Attached as **Exhibit 1** is a true and correct copy of the Declaration of Richard A. Flasck in support of Solas OLED’s Opening Claim Construction Brief.

2. Attached as **Exhibit 2** is a true and correct copy of U.S. Patent No. 7,446,338

3. Attached as **Exhibit 3** is a true and correct copy of U.S. Patent No. 9,256,311

4. Attached as **Exhibit 4** is a true and correct copy of “The Authoritative Dictionary of IEEE Standard Terms, Seventh Edition (2000)”

5. Attached as **Exhibit 5** is a true and correct copy of Excerpts of “The New Oxford American Dictionary, Second Edition”

6. Attached as **Exhibit 6** is a true and correct copy of Excerpts of File History of US Patent No. 7,446,338, Appl. No. 11/235,579

7. Attached as **Exhibit 7** is a true and correct copy of Excerpts of “Concise Oxford English Dictionary, Twelfth Edition”

8. Attached as **Exhibit 8** is a true and correct copy of Petition for *Inter Partes* Review of U.S. Patent No. 9,256, 311, Case No. IPR2019-01668, Paper 1

I declare under penalty of perjury that the foregoing is true and correct.

Executed February 19, 2020, at Los Angeles, California.

/s/ Neil A. Rubin

Neil A. Rubin

CERTIFICATE OF SERVICE

The undersigned certifies that on February 19, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3)(A).

/s/ Reza Mirzaie
Reza Mirzaie